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19 Intertrust Technologies Corporation

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7 Claimant Arxan Technologies, Inc.

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA

14 SAN FRANCISCO DIVISION

15 WHITECRYPTION CORPORATION,

16 Plaintiff,

17 v.

18 ARXAN TECHNOLOGIES, INC.,

19 Defendant.

20 CASE NO. 15-cv-00754-WHO

21 **STIPULATION AND ORDER GRANTING
22 WHITECRYPTION CORPORATION
23 LEAVE TO FILE A FIRST AMENDED
24 COMPLAINT**

25 ARXAN TECHNOLOGIES, INC.,

26 Counter-Claimant,

27 v.

28 WHITECRYPTION CORPORATION, and
1 INTERTRUST TECHNOLOGIES
2 CORPORATION,

3 Counter-Defendants.

STIPULATION

On December 21, 2015, the Court extended the deadline for the parties to amend their pleadings to March 31, 2016 based on the parties' stipulation (Dkt. No. 45).

4 Plaintiff whiteCryption Corporation (“whiteCryption”) seeks to file a first amended
5 complaint in the redacted form attached hereto as **Exhibit A** with an unredacted version lodged
6 following Local Rule 79-5. Defendant and Counter-Claimant Arxan Technologies, Inc.
7 (“Arxan”) consents, pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure, to
8 whiteCryption filing its first amended complaint without waiving any right to challenge the
9 sufficiency of the first amended complaint in response thereto. whiteCryption, Counter-
10 Defendant Intertrust Technologies Corp. (“Intertrust”) and Arxan (collectively the “Parties”)
11 agree that good cause exists for whiteCryption to file its first amended complaint pursuant to Rule
12 16 of the Federal Rules of Civil Procedure.

Arxan intends to file a motion for leave to file a first amended counterclaim within the deadlines imposed by the Court's scheduling order (Dkt. No. 45). whiteCryption and Intertrust will not oppose a timely filed motion by Arxan for leave to file a first amended counterclaim without waiving any right to challenge the sufficiency of the first amended counterclaim in response thereto.

SO STIPULATED.

Dated: February 17, 2016

DLA PIPER LLP (US)

By: /s/ Deborah E. McCrimmon
RAJIV DHARNIDHARKA
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Attorneys for Plaintiff and Counter-
Defendant whiteCryption Corporation
and Counter-Defendant Intertrust
Technologies Corporation.

1 DATED: February 17, 2016

2 By: /s/ Hong-An Vu
3 MICHAEL T. JONES
4 HONG-AN VU
5 Attorneys for Defendant/
6 Counterclaimant Arxan Technologies,
7 Inc.

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ORDER

Based upon the Stipulation of the Parties and good cause appearing, it is ORDERED that whiteCryption is GRANTED leave to file its First Amended Complaint in the form attached hereto as Exhibit A. Further, whiteCryption's First Amended Complaint is deemed filed as of the date of this Order. The Parties will comply with Local Rule 79-5 regarding redactions and sealing requests. Arxan's response to the First Amended Complaint is due 14 days from the date of this Order.

IT IS SO ORDERED.

Dated: February 18, 2016


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WILLIAM H. ORRICK
UNITED STATES DISTRICT COURT JUDGE